

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

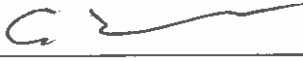
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SYNTEGRAL CONSULTING	:	
CORPORATION, d/b/a HIP HOP GRUBSPOT,	:	
a Florida corporation and MIRIAM CHERY,	:	Civil Action No.
	:	10-Civ-1847(CM)(HBP)
Plaintiffs,	:	
	:	
-against-	:	<b><u>NOTICE OF MOTION</u></b>
	:	
KEITH CLINKSCALES, LAMONTE JONES,	:	
V. BROWN COMPANY, a New York	:	
corporation d/b/a KTC VENTURES, INC.,	:	
PEPSICO, INC., a North Carolina corporation,	:	
and ESPN, INC., a Delaware corporation,	:	
	:	
Defendants.	:	
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PLEASE TAKE NOTICE that, upon the accompanying Declaration of Amelia K. Seewann, dated July 15, 2010, together with the exhibits annexed thereto, and Defendant Keith Clinkscales's Memorandum of Law in Support of Motion to Dismiss or, in the Alternative, for a More Definite Statement, dated July 15, 2010, the undersigned, on behalf of defendant Keith Clinkscales, will move this Court, at the United States District Courthouse, located at 500 Pearl Street, New York, New York 10007, at a date and time to be determined, for an order pursuant to Rule 12(b) of the Federal Rules of Civil Procedure ("FRCP"), dismissing the Second Amended Complaint filed by plaintiffs Syntegral Consulting Corporation d/b/a Hip Hop Grubspot and

Miriam Chery in its entirety, or, in the alternative, under FRCP 12(e) for a more definite statement and for such other relief as the Court deems proper.

Dated: New York, New York  
July 15, 2010

FRANKFURT KURNIT KLEIN & SELZ, P.C.

By:   
Edward H. Rosenthal  
Amelia K. Seewann

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*Attorneys for Defendant  
Keith Clinkscales*

**CERTIFICATE OF SERVICE**

I certify that, on July 15, 2010, I caused to be served a true and correct copy of the above and foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Dated: July 15, 2010

A handwritten signature in black ink, appearing to read 'Amelia K. Seewann', followed by a long horizontal flourish line.

Amelia K. Seewann  
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& Selz, P.C.  
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